

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON, Case No.: 3:18-cv-01477-JR  
LINDSAY ELIZABETH, and HEATHER  
HENDER, individually and on  
behalf of others similarly  
situated,  
Plaintiffs,  
v.  
NIKE, INC., an Oregon Corporation,  
Defendant.

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VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF  
SARA JOHNSTON  
Beaverton, Oregon  
Tuesday, November 24, 2020  
Volume 1

Reported by:  
LESLIE JOHNSON  
RPR, CCRR, CSR No. 11451  
Job No.: 4347395  
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1 approximately. I don't know starting or ending or 01:40:24  
2 where, but I can name five people that I worked with  
3 on the team.

4 BY MR. PRINCE:

5 Q Five women other than yourself? 01:40:37

6 A I believe that's how they identify.

7 Q Can you name them for me, please?

8 A Pat. I don't know how to say or spell her  
9 last name. If I were to hazard a guess, it would be  
10 Bruseau. Marty. 01:40:57

11 Q What's the first letter?

12 A Pat, P, like Patricia. I think it's  
13 Bruseau -- Brister. Brister. B-R-I-S-T-E-R,  
14 Brister. Sorry. I got two people mixed up. Pat  
15 Brister. 01:41:19

16 Marty. I don't remember her last name.  
17 Jenny Rhoten. Emily James. And there was another  
18 woman on our team, and she passed away. I'm -- I  
19 don't remember her name.

20 Q And do you know whether any of those women 01:41:51  
21 that were on your team were able to negotiate their  
22 starting pay?

23 A I don't recall. I don't remember asking.

24 Q When you had a conversation about your  
25 starting pay, I believe you testified earlier that 01:42:10

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1 think it's in my character with that background that 01:44:06  
2 I would have shared and said "Hey, like, I'm going  
3 to take a pay cut here. Can we come to a different  
4 amount?" And they said "We don't negotiate for  
5 entry level." I recall clearly them saying they 01:44:26  
6 will not negotiate for entry level, that it's take  
7 it or leave it.

8 Q But you would have advised the recruiter  
9 that you had been paid more highly than the offer  
10 that was in front of you at the time. Is that -- 01:44:40

11 A I believe I would have.

12 Q You don't know the qualifications of the  
13 other individuals that were being considered for  
14 that senior account services position, do you?

15 MR. KAN: Objection. Lacks foundation. 01:45:09

16 THE WITNESS: Other than Colton told me  
17 about his background, you know, at a kiosk, I do  
18 believe I testified before that I'd seen Emily and  
19 Jenny's résumés, but I don't recall -- I don't  
20 recall any of what I saw because it was so long ago. 01:45:39

21 THE REPORTER: You know, I just got bits  
22 of that answer. I'm not sure if everyone else got  
23 that, but it did cut out a bit, Sara. If you could  
24 repeat.

25 (Record read.) 01:46:03

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REPORTER'S CERTIFICATION

I, Leslie Johnson, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were administered an oath; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [ ] was [ ] was not requested. I further certify I am neither financially interested in the action nor a relative or employee of any attorney or any party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: December 15, 2020

A handwritten signature in cursive script that reads "Leslie Johnson". The signature is written in dark ink and is positioned above the printed name.

LESLIE JOHNSON

CSR No. 11451, RPR, CCRR

*Cahill v. Nike*

No. 3:18-cv-01477-JR (D. Or.)

Deposition Date: November 24, 2020

Deponent: Sara Johnston

Page	Line(s)	Reads	Should Read	Reason
7	11	Menfei	Mengfei	To correct a transcription error
7	25	Renée	Renee	To correct a transcription error
30	5	Yes.	Not when I was interviewed, but when I was interviewing other people.	Misheard the question
32	5	what	where	To correct a transcription error
33	9	Fallgamwalla	Balgamwalla	To correct a transcription error
33	10	David – I don't remember	David Klasner	To correct spelling
37	23	Maybe the lawyer	Maybe at the lawyers' office	To correct a transcription error
39	1	Acevedo	Azavedo	To correct a transcription error
39	6	Acevedo	Azavedo	To correct a transcription error
39	9	Acevedo	Azavedo	To correct inadvertent error in year
39	11	Acevedo's	Azavedo's	To correct a transcription error
39	14	Acevedo's	Azavedo's	To correct a transcription error
39	19	Acevedo's	Azavedo's	To correct a transcription error
39	25	Acevedo	Azavedo	To correct a transcription error
40	5	Acevedo	Azavedo	To correct a transcription error
40	8	Acevedo	Azavedo	To correct a transcription error
40	11	Acevedo	Azavedo	To correct a transcription error
49	2	To my knowledge, no.	Other than Nike, to my knowledge, no.	Misheard the question.
49	22	recognized the same rate as men	recognized at the same rate as men	To correct a transcription error
49	23-24	individuals who started with	individuals who I started with	To correct a transcription error
53	11	to	Too	To correct a transcription error
55	1	skills. In that more junior ASR, I did not realize	skills in that more junior, Sr. ASR role. I did not realize	To correct a transcription error
55	2-3	To my knowledge, I don't think I	To my knowledge, I don't think I viewed it that way.	To correct a transcription error

		viewed it that way until then.		
55	18	When I qualified	Which means to me that I was qualified	To correct a transcription error
71	20	after the same graduate school of management	Atkinson Graduate School of Management	To correct a transcription error
77	19	I also received an on-call.	I transitioned to an on-call role.	To correct a transcription error
80	23	Taleo is an application, a system application	Taleo is an application, an online job application tracking system	Full response to question asked
86	16	SaaS skills that come with that.	Social skills that come with that	To correct a transcription error
88	21	Colton	Colten	To correct a transcription error
89	7-8	I have suggested that two other people apply for the role	I encouraged two other people to apply for the role	To correct a transcription error
90	14	Colton	Colten	To correct a transcription error
90	17	Colton	Colten	To correct a transcription error
91	16	Colton	Colten	To correct a transcription error
92	5	Colton	Colten	To correct a transcription error
92	7	Colton	Colten	To correct a transcription error
92	12	Colton	Colten	To correct a transcription error
93	4	Colton	Colten	To correct a transcription error
99	18	Senior HR position	Senior ASR position	To correct a transcription error
106	25	Colton's	Colten's	To correct a transcription error
107	7	Colton	Colten	To correct a transcription error
107	7	Colton's	Colten's	To correct a transcription error
107	11	Colton	Colten	To correct a transcription error
107	13	Colton	Colten	To correct a transcription error
107	16-17	And Rick said "I'm not going to reveal, but I did negotiate."	And Rick said I'm not going to reveal, but I did negotiate, more than what you make	Full response to the question asked
107	23	Colton	Colten	To correct a transcription error
108	3	Colton	Colten	To correct a transcription error
108	6	Colton	Colten	To correct a transcription error
108	10	Colton	Colten	To correct a transcription error

108	16	Colton	Colten	To correct a transcription error
109	16	Marty. I don't remember her last name. Jenny Rhoten. Emily James. And there was another woman on our team, and she passed away. I'm – I don't remember her name.	Marty. I don't remember her last name. Jenny Rhoten. Emily James. And there was another woman on our team, and she passed away. I'm – I don't remember her name. Also Lori Nearhood	Full response to the question asked
111	16	Colton	Colten	To correct a transcription error
122	2	To get the chain of permission.	To go up the chain to get permission.	To correct a transcription error
123	24	Value structure	VALUES structure	To correct a transcription error
124	5	B	V	To correct a transcription error
124	7	B	V	To correct a transcription error
129	21	Colton	Colten	To correct a transcription error
131	1	Colton	Colten	To correct a transcription error
134	1	OAT	OIT	To correct a transcription error
136	18-19	It's my belief. I don't have a solid knowledge.	It's my belief based on my experience. I don't have solid knowledge beyond that.	To correct a transcript error and provide full response to the question asked
140	6	And the nonapplication track	And the application track	To correct a transcription error
154	24	NCS	in CS	To correct a transcription error
155	17	BSA	ASR	To correct a transcription error
162	25	HPs	pieces	To correct a transcription error
167	14	Sladebo	Fladebo	To correct a spelling error
167	18	Yes	Yes, she was also a BSA.	Misheard the question.
170	20-23	They restructured the way we did work, and they promoted Lynn, and they moved her to a different – they changed how our teams were structured.	They restructured the way we did work, and they promoted Lynn, and they moved her to a different team, which was an off-cycle event that enabled	Complete answer to question



			managers to promote people like Lynn and Mrudula – they changed how our teams were structured.	
171	25	She was a BSA1.	She was a BSA 1?	To correct a transcription error
173	6	Has ever trained on a task	Has ever trained me on a task	To correct a transcription error
173	22	Grant and Jim Sherwin	Leon Fabricki and Jim Sherwin	To correct name
174	24	I would say yeah. I mean I don't -	I would say yeah. But I mean I don't know why that should affect his performance assessment.	Full response to the question asked
175	14	I didn't have the same deliverables as Grant	I didn't work on the same deliverables with Noah like I did with Grant	To correct a transcription error
177	24	I made rec-	I made recommendations to my manager when I was involved in phone screens and interviews.	To correct a transcription error
181	11	I didn't know that I could.	No, I didn't know that I could.	Full response to the question asked
181	12	That I acted	That it acted	To correct a transcription error
186	7	I think it would have been	No, I think it would have been	Full response to the question asked
189	3	Lindsay	Lynn Fladebo	To correct a transcription error
192	4	I'm sorry. I'm sorry.	I'm sorry. I'm sorry. But as I testified earlier, senior BSAs performed the same general duties as junior and intermediate BSAs.	Full response to the question asked

192	8	I don't have visibility, to my knowledge.	I don't have visibility, to my knowledge. But as I testified earlier, senior BSAs performed the same general duties as junior and intermediate BSAs.	Full response to the question asked
194	7-8	I did not know that at the time I was made an intermediate BSA, no.	I did not know the salary range at the time I was made an intermediate BSA, no.	Full response to the question asked.
196	22	E band	U band	To correct a transcription error.
199	14	Intermediate 1	BSA 1	To correct a transcription error
199	24	initial	Initial phone screen	Full responses to question asked
201	15	And we discussed advanced --	And discussed the questions we wanted to ask in advance	Full responses to question asked
202	18	If they are not promoted at the same	If they are not promoted at the same rate	To correct a transcription error
220	22	Justin reached out to all of the Cs	Justin reached out to all of the SMEs	To correct a transcription error.
229	14	I went on the coast with	I did Hood to Coast with	To correct a transcription error
230	14-15	I viewed everything up to that point as consensual.	I viewed everything during that period as consensual.	Fully response to the question asked
244	22	Carsecken	Carspecken	To correct a transcription error
254	12-13	Justin Larsen told Juanita Danielson, "You talk to me about her issues with Chad"	Justin Larsen told Juanita Danielson that she should talk to me about her issues with Chad	To correct a transcription error
257-258	25-1	Against because she was let go and severed. They offered her	Against because she was let go and I suspect was severed. I believe they	Full response to the question asked.

		severance, and they let her go.	offered her severance, and they let her go.	
276	24	And I said “Wow, that’s – okay.”	And I said “Wow, that’s shocking, okay.”	Full response to the question asked
277	2	OTE	OTP	To correct a transcription error
300	10-11	an intermediate	a junior BSA	To conform to facts

Subject to the above changes, I declare under the penalties of perjury of the laws of the United States that my deposition transcript is true and correct.

Executed on 1/13/2021 in Beaverton,  
OR

DocuSigned by:  
  
9B8F5B64ECA443A...  
Sara JOHNSTON